

Alycia A. Degen (SBN 211350)
adegen@sidley.com
Sean A. Commons (SBN 217603)
scommons@sidley.com
SIDLEY AUSTIN LLP
555 West Fifth Street
Los Angeles, CA 90013
Telephone: +1 213 896 6010
Facsimile: +1 213 896 6600

Ahilan Arulanantham (SBN 237841)
arulanantham@law.ucla.edu
UCLA CENTER FOR IMMIGRATION
LAW AND POLICY
385 Charles E. Young Dr. East
Los Angeles, CA 90095
Telephone: +1 310 825 1029

Jessica Karp Bansal (SBN 277347)
jessica.b@uwunited.org
UNEMPLOYED WORKERS UNITED
1355 N. Mentor Ave, #40583
Pasadena, CA 91104
Telephone: +818-570-6731

Attorneys for Plaintiffs
[Additional Counsel Listed on Next Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

KESHAV BHATTARAI; SAJJAN PANDEY;
SUMNIMA THAPA; DONALDO POSADAS
CACERES; SORAYDA RODRIGUEZ
MOTIÑO; DENIS MOLINA CHAVEZ; S.S.,
individually and on behalf of others similarly
situated; and G.D.P., individually and on
behalf of others similarly situated,

Plaintiffs,

v.

KIRSTJEN NIELSEN, in her official capacity
as Secretary of Homeland Security; ELAINE
C.DUKE, in her official capacity as Deputy
Secretary of Homeland Security; UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY; and UNITED STATE OF
AMERICA

Defendants.

Case No. 3:19-cv-00731-EMC

**JOINT STATUS REPORT AND JOINT
STIPULATION TO CONTINUE STATUS
CONFERENCE**

The Honorable Edward M. Chen

Additional Counsel for Plaintiffs

Emilou MacLean (SBN 319071)
emaclean@aclunc.org
William S. Freeman (SBN 82002)
wfreeman@aclunc.org
ACLU FOUNDATION
OF NORTHERN CALIFORNIA
39 Drumm Street
San Francisco, California 94111
Telephone: +1 415 621 2493
Fax: +1 415 863 7832

Mark E. Haddad (SBN 205945)
markhadd@usc.edu
Adjunct Lecturer in Law
USC Gould School of Law*
University of Southern California
699 Exposition Boulevard
Los Angeles, CA 90089-0071
Telephone: +1 213 675 5957

Nicole M. Ryan (SBN 175980)
nicole.ryan@sidley.com
SIDLEY AUSTIN LLP
555 California Street
Suite 2000
San Francisco, CA 94104
Telephone: +1 415 772 1219
Facsimile: +1 415 772 7400

Marisol Ramirez (SBN 307069)
marisol.ramirez@sidley.com
555 West Fifth Street
Los Angeles, CA 90013
Telephone: +1 213 896 6000
Facsimile: +1 213 896 6600

Jennifer Pasquarella (SBN 263241)
jpasquarella@aclusocal.org
ACLU FOUNDATION
OF SOUTHERN CALIFORNIA
1313 West 8th Street
Los Angeles, CA 90017
Telephone: +1 213-977-5236
Fax: +1 213 977 5297

Caleb Soto (SBN 315901)
csoto@ndlon.org
NATIONAL DAY LABORER
ORGANIZING NETWORK
1030 S. Arroyo Pwy., Ste 106
Pasadena, CA 91105
Telephone: +1 626 799 3566

** Institution listed for identification purposes only*

1 As ordered by the Court, Dkt. No. 40, the Parties hereby file this joint statement setting forth
 2 the current status of this action. The Parties also respectfully stipulate to continue the upcoming
 3 September 27 Status Conference to October 25, 2022.

4 As described in the Parties' June 21, 2022 Joint Status Report, Dkt. 39, this action is stayed
 5 pending final disposition of Defendants' appeal of the preliminary injunction in *Ramos v. Nielson*,
 6 No. 18-01554 [*"Ramos appeal"*] or other order of this Court. Dkt. No. 23.

7 Defendants' *Ramos* appeal remains pending and further proceedings in the appeal remain
 8 stayed pending settlement negotiations, which are ongoing. The Parties continue to expect that if
 9 they are able to reach a settlement in the *Ramos* appeal, the agreement would encompass and resolve
 10 the claims in this action as well. The next mediation conference is scheduled for October 11, 2022.
 11 Because the Parties do not expect any developments in this matter prior to the next mediation, they
 12 respectfully stipulate to continue the Status Conference currently scheduled for September 27, 2022
 13 to October 25, 2022. The Parties' preference is to hold the Status Conference at 1:00pm, but they can
 14 also make themselves available at 2:30pm should the Court prefer.

15
 16 Respectfully submitted,

17
 18 /s/Alycia A. Degen
 19 ALYCIA A. DEGEN
 20 SIDLEY AUSTIN LLP
 21 555 West Fifth Street
 22 Los Angeles, CA 90013
 Telephone: +1 213 896 6010
 Facsimile: +1 213 896 6600
 adegens@sidley.com

23 *Attorney for Plaintiffs*

24 BRIAN M. BOYNTON

25 Principal Deputy Assistant Attorney General

26
 27 BRIGHAM J. BOWEN
 Assistant Branch Director

/s/ Adam D. Kirschner

ADAM D. KIRSCHNER

IL Bar # 6286601

Senior Trial Counsel

United States Department of Justice

Civil Division, Federal Programs Branch

1100 L Street, NW

Washington, DC 20005

Tel: (202) 353-9265

Fax: (202) 616-8460

Email: adam.kirschner@usdoj.gov

Mailing Address

Post Office Box 883

Washington, D.C. 20044

Courier Address:

1100 L Street NW, Room 11020

Washington, D.C. 20005

Attorneys for Defendants

CIVIL LOCAL RULE 5-1(i) ATTESTATION


Pursuant to Local Rule 5-1(i)(3), regarding signatures, Alycia A. Degen hereby
attests that concurrence in the filing of this document has been obtained from counsel for
Defendants.

/s/ Alycia A. Degen

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED. The Status Conference currently scheduled for September 27, 2022 is continued to October 25, 2022 at ~~1:00 PM~~ **2:30 PM**.

Dated: September 22, 2022


The Honorable Edward M. Chen
United States District Judge